

September 30, 1998

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Re. Docket Control Number OPPTS-62156

To whom it may concern,

The Children's Health Protection Advisory Committee (CHPAC) was formed in 1997 by Administrator Carol Browner to advise EPA on environmental risks to children. At the Committee's July meeting, it discussed the importance of EPA's proposed rule concerning "Identification of Dangerous Levels of Lead," which was published in the Federal Register on June 3, 1998. The Committee's Science and Research Work Group has reviewed technical issues associated with both the methods described and the standards proposed in the draft as published and concludes that significant reasons for concern exist regarding the adequacy of both the methods and the standards. The workgroup and I recognize the complexity of this issue and appreciate that there are important science and public policy issues at stake here. We feel that it is critical for the CHPAC to consider all of these issues at its next meeting in order to offer appropriate and thoughtful comment. The complexity of the issues involved requires that the Children's Health Protection Advisory Committee consider the issues in sufficient depth to form a consensus recommendation to EPA.

Thus, as the Chair of the Children's Health Protection Advisory Committee, I am writing formally to request an extension of the comment period until at least December 1, 1998. This matter will be on the Committee's agenda at its next meeting, on November 5 and 6, 1998.

Thank you very much for your consideration.

J. Routt Reigart, M.D., FAAP

Professor of Pediatrics

Medical University of South Carolina Chair, USEPA Children's Health Protection Advisory Committee

Cc: Carol Browner
Ramona Trovato
Paula Goode